

From: [John Hebert](#)
To: [Laura Parsons](#); [Russell Wasem](#); [Jennifer Gaines](#); [Dan Peacock](#)
Subject: Fw: Bait station with and without viewing window
Date: 05/27/2010 04:39 PM

Can you please take a look at the following email and let me know what you think? In summary, the registrant wants to sell two types of the "same" bait station under one registration number. I think I'm OK with this, but I'm interested to hear what you think.

Thanks,
John

----- Forwarded by John Hebert/DC/USEPA/US on 05/27/2010 04:34 PM -----

From: "Jim Barron" <jbarron@exponent.com>
To: John Hebert/DC/USEPA/US@EPA
Date: 05/26/2010 03:30 PM
Subject: Bait station with and without viewing window

John,

As discussed by phone today, PM wants to come in with several new registrations for a bromethalin 0.01% bait block packaged in a refillable bait station. The concept is similar to two Tier IV models recently registered (67517-88 and -89).

This new bait station comes in two models, one with a clear plastic window allowing the bait to be viewed and the other one with no viewing window. This new bait station will come in with data supporting Tier III certification that was conducted on the windowed version. The testing was done on the windowed version only based on discussions with Bill Jacobs indicating that the windowed version, with its weaker construction around the window area, would be worst case for tampering considerations compared to the version without a window.

Of course, PM wants to be able to market both versions for consumer as well as non-consumer uses.

Our proposal is to have both of the windowed and non-windowed models covered under the same Master label. The use directions don't really address the window as its only function is for the user to see the bait once it's installed. The labeling could include a special paragraph providing some optional

marketing claims at the end of the label that apply only to the bait stations that have a bait viewing window.

I understand that while you are not totally uncomfortable with this proposal, you wish to get some additional input. Thank you for doing so and as soon as possible will you please let us know one way or another on this?

Thanks as always,

A handwritten signature in black ink that reads "Jim Barron". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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